

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE

JUAN RIVERA ORTIZ
EMELY MARTINEZ REYES

DEBTORS

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CASE NO. 12-00947 ESL

CHAPTER 13

DEBTORS' MOTION IN COMPLIANCE WITH *TO SHOW CAUSE*
DATED May 24, 2016, DOCKET #48

TO THE HONORABLE COURT:

NOW COME, **JUAN RIVERA ORTIZ** and **EMELY MARTINEZ REYES**, debtors, through the undersigned attorney, and very respectfully state and pray as follows:

1. On March 21, 2016 this Honorable Court issued the following *Order*:

"The debtor's reply to the trustee's motion to dismiss (Docket #45) is hereby granted. The trustee's motion to dismiss (Docket #44) is hereby denied. The debtors shall move the court within sixty (60) days informing payment of tax refunds for 2012 and 2013.

IT IS SO ORDERED." *ORDER*, dated March 21, 2016 (Docket #46).

2. On May 19, 2016 the debtors paid the Trustee the sum of \$719 to cover the 2012 tax refund (\$353) and the 2013 tax refund (\$366). Attached is copy of Trustee's *Financial Summary*, dated May 25, 2016 to evidence said \$719.00 payment.

3. On May 24, 2016, this Honorable Court issued an *Order to Show Cause*, (Dkt. #48), as follows:

"The debtor is hereby ordered to show cause within 21 days why the case should not be dismissed for failure to comply with this court's order of March 21, 2016 (dkt. #46) by failing to file evidence of payment of tax refunds SO ORDERED." *Order to Show Cause*, dated May 24, 2016, dkt. #48.

4. The debtors respectfully state that they did comply with this Court's Order to pay the tax refunds, within the sixty (60) days period of time granted by this Honorable Court

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pursuant to *Order*, dated March 21, 2016, dkt. #46. Evidence is hereby submitted that the \$719 payment covering the 2012 (\$353) and the 2013 (\$366) tax refunds, which total the sum of \$719.00 were paid into the confirmed Plan account for distribution by the Trustee.

5. However, due to an oversight, the debtors forgot to inform this Honorable Court of said \$719 payment and file evidence of having paid the 2012 and 2013 tax refunds into the confirmed Plan.

6. Based on the above stated, the debtors respectfully request that this Honorable Court be informed of the foregoing, allow the debtors to continue under the protection of this Honorable Court and complete their confirmed Plan payments, in the above captioned case.

WHEREFORE, debtors, through the undersigned attorney respectfully request that this Honorable Court grant the foregoing motion in compliance with this Court's *Order to Show Cause*, dkt. #48, in the above captioned case.

I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF system which will send notice of same to the Chapter 13 Trustee, Alejandro Oliveras Rivera, Esq.; I also certify that a copy of this motion was sent via US Mail to debtors Juan Rivera Ortiz and Emely Martinez Reyes, HC 1 Box 7355 Aguas Buenas PR 00703.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 25th day of May, 2016.

/s/ Roberto Figueroa Carrasquillo USDC #203614
RFIGUEROA CARRASQUILLO LAW OFFICE PSC
ATTORNEY FOR DEBTORS
PO BOX 186 CAGUAS PR 00726
TEL NO 787-744-7699 FAX 787-746-5294
Email: rfigueroa@rfclawpr.com



CUSTOMER'S RECEIPT

KEEP THIS
RECEIPT FOR
YOUR RECORD

SEE BACK OF THIS RECEIPT
FOR IMPORTANT CLAIM
INFORMATION

NOT
NEGOTIABLE

Serial Number

19587029578



UNITED STATES
POSTAL SERVICE

Serial Number

19587029578

Pay to

Alejandro Olivares Rivera

Member Chapter 13 Trustee Office

P.O. Box 71486

Member

San Juan P.R. 00713

UNITED STATES POSTAL SERVICE

1:0000080021

Alejandro Olivares Rivera

Member Chapter 13 Trustee Office

P.O. Box 71486 San Juan P.R. 00713-8586

607349 \$719.00

POSTAL MONEY ORDER

Serial Number

19587029578

\$719.00

Serial Number Delivery and Collection

19587029578-ESC

Pay to

Alejandro Olivares Rivera

Member Chapter 13 Trustee Office

P.O. Box 71486

Member

San Juan P.R. 00713

19587029578

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FINANCIAL SUMMARY - CASE 12-00947

JUAN RIVERA ORTIZ paying \$719.00 ANNUALLY

Receipts	Rcpts/Deb Refunds	Disbursements	Adjustments	Trustee Disb	Trustee Adj	Show All
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Limits: Select Start Date Select Claim ID Select Payee Name Check Status: ☒ Cleared ☐ Stale Dated ☐ Stop Payment ☐ Cancelled ☐ Voided ☐ Outstanding

Date	Payee	Payee Name	Source / Check	Description	Receipts	Disbursements	Balance
5/19/2016			0714 86701 0003	LOCKBOX PAYMENT	\$719.00		
4/26/2016			0714 86300 0003	LOCKBOX PAYMENT	\$150.00		
3/10/2016			0714 86700 0003	LOCKBOX PAYMENT	\$150.00		
3/10/2016			0714 86301 0003	LOCKBOX PAYMENT	\$150.00		
2/9/2016			0714 86301 0003	LOCKBOX PAYMENT	\$150.00		
1/11/2016			0714 86305 0003	LOCKBOX PAYMENT	\$150.00		
12/8/2015			0714 86302 0003	LOCKBOX PAYMENT	\$150.00		
11/10/2015			0714 86303 0003	LOCKBOX PAYMENT	\$150.00		
10/7/2015			0714 86304 0003	LOCKBOX PAYMENT	\$150.00		
9/23/2015			0714 86308 0003	LOCKBOX PAYMENT	\$150.00		
8/11/2015			0714 86301 0003	LOCKBOX PAYMENT	\$150.00		
7/13/2015			0714 86302 0003	LOCKBOX PAYMENT	\$150.00		
6/19/2015			0714 86301 0003	LOCKBOX PAYMENT	\$150.00		
5/6/2015			0714 86301 0003	LOCKBOX PAYMENT	\$150.00		
4/8/2015			0714 86300 0003	LOCKBOX PAYMENT	\$150.00		
3/10/2015			0714 86313 0003	LOCKBOX PAYMENT	\$150.00		
2/12/2015			0714 86304 0003	LOCKBOX PAYMENT	\$150.00		
1/13/2015			0714 86305 0003	LOCKBOX PAYMENT	\$150.00		
12/30/2014			0714 86302 0003	LOCKBOX PAYMENT	\$150.00		
11/18/2014			0714 86706 0003	LOCKBOX PAYMENT	\$150.00		
10/14/2014			0714 86705 0003	LOCKBOX PAYMENT	\$150.00		
9/16/2014			0501 00040 8037	LOCKBOX PAYMENT	\$150.00		
8/13/2014			0504 00460 1256	LOCKBOX PAYMENT	\$150.00		
7/15/2014			0501 00980 8105	LOCKBOX PAYMENT	\$150.00		
6/13/2014			0500 00490 5063	LOCKBOX PAYMENT	\$150.00		
5/8/2014			0658 00181 3342	LOCKBOX PAYMENT	\$150.00		
4/11/2014			0501 01060 7561	LOCKBOX PAYMENT	\$150.00		
3/11/2014			0500 00810 2913	LOCKBOX PAYMENT	\$150.00		
2/28/2014			0501 00600 4503	LOCKBOX PAYMENT	\$150.00		
1/28/2014			0500 00210 5730	LOCKBOX PAYMENT	\$150.00		
12/24/2013			0501 00700 6020	LOCKBOX PAYMENT	\$150.00		
12/3/2013			0505 00640 1383	LOCKBOX PAYMENT	\$150.00		
10/17/2013			0501 00080 5778	LOCKBOX PAYMENT	\$150.00		
10/8/2013			0502 01040 0108	LOCKBOX PAYMENT	\$150.00		
10/2/2013			0500 00500 7724	LOCKBOX PAYMENT	\$150.00		
7/16/2013			0655 00281 6686	LOCKBOX PAYMENT	\$150.00		
6/18/2013			0504 00160 2512	LOCKBOX PAYMENT	\$150.00		
5/21/2013			0501 00940 7792	LOCKBOX PAYMENT	\$150.00		
4/11/2013			0501 01010 5694	LOCKBOX PAYMENT	\$150.00		
3/13/2013			0502 01530 9630	LOCKBOX PAYMENT	\$150.00		
2/5/2013			0651 00141 2080	LOCKBOX PAYMENT	\$150.00		
1/3/2013			0651 00281 9058	LOCKBOX PAYMENT	\$150.00		
12/3/2012			0502 00290 2073	LOCKBOX PAYMENT	\$150.00		
10/30/2012			0500 00960 7818	LOCKBOX PAYMENT	\$150.00		
10/3/2012			0503 01340 5534	LOCKBOX PAYMENT	\$150.00		
8/28/2012			0503 01390 0090	LOCKBOX PAYMENT	\$150.00		
7/31/2012			0501 00460 7447	LOCKBOX PAYMENT	\$150.00		
7/3/2012			0510 00740 4545	LOCKBOX PAYMENT	\$150.00		
5/23/2012			0500 01640 3266	LOCKBOX PAYMENT	\$150.00		
4/11/2012			0500 00180 9144	LOCKBOX PAYMENT	\$150.00		
3/9/2012			0651 00221 3693	LOCKBOX PAYMENT	\$150.00		

					Totals:	\$8,219.00	\$0.00
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